

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC
Paola D. Vera, Esq.
120 Bloomingdale Rd., Suite 400
White Plains, NY 10605
914-385-0292

In Re:

Case No.: 18-23886-RG

Luz M. Villafane,

Debtor(s).

Chapter: 13

Judge: Rosemary Gambardella

DEBTOR'S OPPOSITION TO CERTIFICATION OF DEFAULT
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(d)

The above named debtor, by and through her attorney of record, Paola D. Vera, Esq. of Cabanillas & Associates, P.C., hereby opposes Specialized Loan Servicing's Certification of Default, and in support thereof presents the Certification of Paola D. Vera, Esq. and shows unto the Court the following:

1. On July 11, 2018 the debtor filed a voluntary Chapter 13 petition with the clerk of this court.
2. On March 29, 2019 Specialized Loan Servicing filed a motion seeking relief from the Automatic stay in regards to 108 Linnet St Bayonne, NJ 07002.
3. An order curing Post-Petition Arrears resolving Motion for Relief from Stay was entered on May 7, 2019.
4. On September 27, 2019 creditor filed a Certification of Default stating the debtor has not made payments for August 2019 and September 2019.

5. The debtor is current through September 2019, receipts for payments have been attached hereto as "Exhibit A".

6. Therefore the Debtor respectfully requests that she be given the opportunity to cure all post-petition arears.

WHEREFORE, the debtor respectfully requests that the instant Motion be denied; and the debtor be granted such other and further relief as this Court deems proper.

Dated: Union City, New Jersey
October 7, 2019

CABANILLAS & ASSOCIATES, PC

/s/Paola D. Vera
Paola D. Vera, Esq.
4100 Kennedy Blvd
Union City, New Jersey 07087

EXHIBIT

A

UNITED STATES POSTAL SERVICE®

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SEE BACK OF THIS RECEIPT FOR IMPORTANT CLAIM INFORMATION
NOT NEGOTIABLE

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Serial Number
26178915868

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2019-09-27 Post Office 070020 Amount \$450.00 Clerk 18

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Serial Number	Year, Month, Day	Post Office	Amount	Clerk	
26178878608	2019-08-30	070020	\$1,000.00	04	

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Serial Number	Year, Month, Day	Post Office	Amount	Clerk	
26178878610	2019-08-30	070020	\$445.00	04	

UNITED STATES POSTAL SERVICE		CUSTOMER'S RECEIPT			
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	Address				
Serial Number	Year, Month, Day	Post Office	Amount	Clerk	
26178878597	2019-08-30	070020	\$1,000.00	04	

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Paola D. Vera Cabanillas & Associates PC 120 Bloomingdale Rd., Ste 400 White Plains, NY 10605	
In Re: Luz M. Villafane	

Case No.: 18-12775-RG

Chapter: 13

Adv. No.:

Judge: Rosemary Gambardella

CERTIFICATION OF SERVICE

1. I, Niobi L. Soler:

☐ represent _____ in this matter.

☒ am the secretary/paralegal for Paola D. Vera, Esq., who represents Luz M. Villafane in this matter.

☐ am the ____ in this case and am representing myself.

2. On 10/7/19 I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

Opposition to Certification of Default

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: 10/7/19

Niobi L. Soler
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Luz M Villafane 108 Linnett St. Bayonne, NJ 07002	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)
Marie-Ann Greenberg 30 Two Bridges Road; Suite 330 Fairfield, NJ 07004	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)
KML Law Group, P.C. <i>Attn: Denise Carlson</i> 216 Haddon Avenue, Ste. 406 Westmont, NJ 08108	Attorney for Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)
Specialized Loan Servicing 8742 Lucent Blvd. Ste. 300 Littleton, CO 80129 <i>Attn: Authorized Agent</i>	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)